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*[Proposed] Counsel for Official Committee  
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re  
CASH CLOUD, INC. dba COIN CLOUD,  
Debtor.

Case No.: 23-10423-mkn  
Chapter 11

**SECOND STIPULATION TO EXTEND  
DEADLINE TO FILE OBJECTIONS TO  
INTERIM ORDER AUTHORIZING  
DEBTOR TO OBTAIN POST-PETITION  
FINANCING [ECF NO. 132]**

Cash Cloud, Inc. dba Coin Cloud (“Debtor” or “Debtor in Possession”) and the Official Committee of Unsecured Creditors (the “Official Committee” and with the Debtor, “Parties”), by and through their undersigned counsel of record, hereby enter into this Second Stipulation to Extend Time to File Objections to Interim Order Authorizing Debtor to Obtain Post-Petition Financing [ECF No. 132] (the “Second Stipulation”).

**RECITALS**

This Second Stipulation is entered into with reference to the following recitals:

1. The Debtor in Possession filed its Voluntary Petition for Relief on February 7, 2023 [ECF No. 1].

2. On February 8, 2023, the Debtor in Possession filed its *Motion for Interim and Final Orders (I) Authorizing Debtor to Obtain Post-Petition Senior Secured, Superpriority Financing; (II) Granting Liens and Superpriority Claims; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief* [ECF No. 35] (the “Motion”).

3. On February 15, 2023, this Court convened a hearing, on shortened time, to consider the relief requested by the Debtor in the Motion.

4. On February 17, 2023, this Court entered its *Interim Order Under Bankruptcy Code Sections 105, 361, 362, 363, 364(C)(1), 364(C)(2), 364(C)(3), 364(D)(1) and 364(E) and Bankruptcy Rules 2002, 4001, 6004 and 9014 (I) Authorizing Debtor to (A) Obtain Postpetition Financing and (B) Grant Adequate Protection and (II) Scheduling Final Hearing* [ECF No. 132] (“Interim Order”).

5. Also on February 17, 2023, the Official Committee was appointed by the Office of the United States Trustee [ECF No. 131].

6. On February 24, 2017, Counsel for the Official Committee filed their Notice of Appearance and Request for Special Notice [ECF No. 168].

7. On March 2, 2023, the Parties stipulated to extend the deadline for the Official Committee to file an opposition and objections to the Motion and the Interim Order, from March 3, 2023, until March 10, 2023 and to extend the deadline for the Debtor to file a reply to any opposition or objection lodged by the Official Committee in support of its Motion from March 10, 2023, until March 15, 2023 [ECF No. 194]. The Court entered an order approving that stipulation on March 3, 2022 [ECF No. 200].

8. The Parties are engaged in resolution negotiations and, consequently, have agreed that the Official Committee will have up to and including March 13, 2023, to file an opposition and objections to the Motion and the Interim Order.

**STIPULATION**

9. The undersigned counsel for the parties, pursuant to paragraph 29 of the Interim Order, hereby stipulate to extend the deadline for the Official Committee to file an opposition and objections to the Motion and the Interim Order, from March 10, 2023, until March 13, 2023.

**IT IS SO STIPULATED BY:**

Dated March 10, 2023.

Dated March 10, 2023.

McDONALD CARANO LLP

FOX ROTHSCHILD LLP

/s/ Ryan J. Works

/s/ Brett A. Axelrod

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